

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>IN RE: NATIONAL PRESCRIPTION</b>	)	<b>MDL 2804</b>
<b>OPIATE LITIGATION</b>	)	
	)	<b>Case No. 1:17-md-2804-DAP</b>
<b>This document relates to:</b>	)	
	)	<b>Judge Dan Aaron Polster</b>
<i>State of Alabama v. Purdue Pharma LP, et al.</i>	)	
<b>Case No. 1:18-OP-45236-DAP (N.D. Ohio)</b>	)	

**PLAINTIFF STATE OF ALABAMA’S UNOPPOSED MOTION TO EXTEND  
DEADLINE TO FILE AMENDED COMPLAINT**

Plaintiff, the State of Alabama, (“Plaintiff”) hereby moves this Honorable Court for an order extending its deadline to file its amended complaint pursuant to the Court’s Case Management Order One (“CMO”) (ECF Doc. 232). The CMO set Plaintiff’s case as a test case to brief threshold issues on common claims at the motion to dismiss stage and granted Plaintiff a deadline of May 9, 2018 to amend its complaint or provide notice that its complaint will not be amended. Plaintiff intends to amend its complaint but requests that the Court grant an extension to do so while Plaintiff continues to analyze the ARCOS data that was released on April 20, 2018. Plaintiff continues to receive additional information from the ARCOS data that is vital to its efforts to amend its complaint.

Plaintiff contacted Manufacturer and Distributor Liaison Counsel via email on May 3, 2018 and May 7, 2018 to see if they had any objections to Plaintiff’s request to extend its deadline to May 18, 2018, which they granted to the local government plaintiffs. Liaison Counsel for the Manufacturers does not oppose this extension, and Liaison Counsel for the Distributors has not responded to Plaintiff’s request. As a result, Plaintiff deems its request to an extension to be unopposed.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant its Unopposed Motion to Extend Deadline to File its Amended Complaint to May 18, 2018. For the Court's convenience, Plaintiff has attached a proposed order as Exhibit A.

Respectfully submitted,

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*Attorney General*

By:

s/ Rhon E. Jones

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**CERTIFICATE OF SERVICE**

I hereby certify that on 8<sup>th</sup> day of May, 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtain through, the Court CM/ECF Systems.

/s/ Rhon E. Jones  
OF COUNSEL